

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

TONY COLLINS, NAIMATULLAH
NAYZEE and ANN MURRAY, for
themselves and all others similarly situated,

Plaintiffs,

Y.

NPC, INTERNATIONAL, Inc.,

Defendant.

Case No. 3:17-cv-00312

DECLARATION OF VONNIE WALBERT

1. My name is Vonnie Walbert. I am the Senior Vice President of Human Resources for NPC International, Inc. ("NPC"). I have personal knowledge of the matters herein.

2. Because of my position, I have access to and am generally familiar with information regarding NPC International, Inc.'s employees, including delivery drivers, policies, and matters pertaining to their employment by NPC.

3. I and my staff have reviewed NPC's personnel data for each of the three Named Plaintiffs.

4. NPC maintains all store employee personnel files electronically, through a system known as SAP, which is accessible via the company web portal.

5. Employees view and sign all policies and agreements electronically through SAP, including NPC's Arbitration Agreement.

6. To electronically sign a document in SAP, an employee must: login in to his or her SAP file using an individual sign-on access; open the “My Documents” tab; click on the individual document to be viewed, which opens the document in the full screen for review;

after review, close the document; and click on the "Acknowledged Document" box, which appears to the right of the document title.

7. Once an employee signs a document in SAP, the name of the document automatically populates in the "Acknowledged Documents" section in SAP, along with the date the Employee signed it.

8. Attached hereto as Exhibit 1-A is NPC's Arbitration Agreement with Tony Collins, which was offered for electronic view and sign-off on October 1, 2014.

9. NPC hired Tony Collins ("Plaintiff Collins") on or about February 17, 2009.

10. Attached as Exhibit 1-B is a screen shot from Plaintiff Collins' "Acknowledged Documents" in SAP, which lists the Arbitration Agreement and an acknowledgment date of October 24, 2014. Based on my review of these records, Plaintiff Collins viewed and signed the Arbitration Agreement on October 24, 2014.

11. Attached hereto as Exhibit 1-C is NPC's Arbitration Agreement with Naimatullah Nyazee.

12. NPC hired Naimatullah Nyazee ("Plaintiff Nyazee") on or about December 2, 2014.

13. Attached as Exhibit 1-D is a screen shot from Plaintiff Nyazee's "Acknowledged Documents" in SAP, which lists the Arbitration Agreement and an acknowledgment date of December 3, 2014. Based on my review of these records, Plaintiff Nyazee viewed and signed the Arbitration Agreement on December 3, 2014.

14. Attached hereto as Exhibit 1-E is NPC's Arbitration Agreement with Ann Murray.

15. NPC hired Ann Murray ("Plaintiff Murray") on May 6, 2011 (to April 1, 2014). NPC hired Plaintiff Murray for a second time on May 5, 2015.

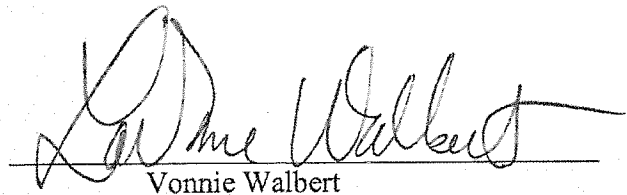
16. Attached as Exhibit 1-F is a screen shot from Plaintiff Murray's "Acknowledged Documents" in SAP, which lists the Arbitration Agreement and an acknowledgment date of September 30, 2015. Based on my review of these records, Plaintiff Murray viewed and signed the Arbitration Agreement on September 30, 2015.

17. Not all delivery drivers employed by NPC have entered into arbitration agreements with NPC. Delivery drivers may continue their employment with NPC without accepting NPC's arbitration agreement.

18. During the previous three years, NPC has employed approximately 49,930 delivery drivers.

I declare under penalty of perjury pursuant to 28 U.S.C. 1746 that the foregoing is true and correct.

Dated: April 28, 2017



Vonnie Walbert